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October 5, 2004

**A. Richard Bailey**  
Direct Phone 215.665.2040  
Direct Fax 215.701.2040  
abailey@cozen.com

**VIA FACSIMILE**

Bradford N. Louison, Esquire  
Merrick Louison & Costello, LLP  
67 Batterymarch Street  
Boston, Massachusetts 02110

Re: Great Northern Insurance Company v. Intercity Alarms  
Date of Loss: 1/22/03  
Your Claim No.: 863369-48  
Our File No.: 133717

Dear Brad:

In reviewing my file, I note that we never resolved the issue of whether Intercity Alarms properly responded to plaintiff's Request for Admissions. I am enclosing to you a copy of your letter dated May 3, 2004 which is self-explanatory.

In view of the fact that you have completed the deposition of John Vose and the deposition of Intercity's Rule 30(b)(6) representatives have been completed as well as the deposition of Deputy Chief Glen Rogers, please advise whether you intend to respond to plaintiff's Request for Admissions. I need your responses. Please let me hear from you within the next week.

Very truly yours,

COZEN O'CONNOR

By: A. Richard Bailey

ARB/jd  
Enclosure

**MERRICK, LOUISON & COSTELLO, LLP**

ATTORNEYS AT LAW

67 BATTERYMARCH STREET  
BOSTON, MASSACHUSETTS 02110

TELEPHONE: (617) 439-0305  
FACSIMILE: (617) 439-0325  
www.merricklc.com

May 3, 2004

A. Richard Bailey  
Cozen & O'Connor  
1900 Market Street  
Philadelphia, PA 19103-3508

**Re: My Client: Inter-City Alarm**  
**Our Claim No: 863369-48-Scottsdale Ins. Co.**  
**Your Claim No: 133717**

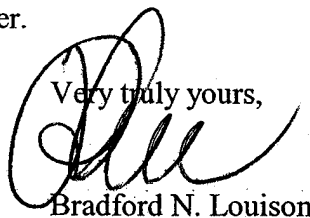
Dear Mr. Bailey:

Thank you for your letter of April 29, 2004, with regards to my response to your request for admissions of fact. I think that those requests for admissions that my client stated it could not answer are really not appropriate subject matters for admissions. I do not think that it is appropriate to ask the defendant to admit or deny the truth of the fire departments determination of the cause of the fire, etc. I do not think that it is appropriate for you to ask my client to admit or deny the truth of what John Vose did or saw the day of the fire. It is my intention to depose John Vose. After his deposition, there may be facts considerably different from those set forth in the Fire Department's report. The deposition of Vose and the plaintiff will constitute the "reasonable inquiry" and you may wish to reassert these requests for admissions at the conclusion of discovery. However, at this time, I stand by the response as indicated.

Please let me know if you wish to file a motion to compel. If so, I will seek a protective order form responding to these admissions pending the conclusion of discovery. In any event, I look forward to seeing when we get these two depositions rescheduled.

Thank you for your attention to this matter.

Very truly yours,



Bradford N. Louison

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## FACSIMILE

FROM: A. Richard Bailey  
 SENDER'S PHONE: 215.665.2040  
 # OF PAGES (INCLUDING COVER): 3  
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